

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION

No.

5:20-CR-227-1 FL (3)

FILED IN OPEN COURT
ON 5-13-2020
Peter A. Moore, Jr., Clerk
US District Court
Eastern District of NC
JAA

UNITED STATES OF AMERICA

vs.

CAMERON HAYES

INDICTMENT

The Grand Jury charges that:

Counts One Through Three

Beginning at a time unknown and ending on or about October 4, 2019, in the Eastern District of North Carolina, CAMERON HAYES, the defendant herein, did knowingly receive the following visual depictions, that is, digital and computer images in files that had been mailed, shipped and transported in interstate and foreign commerce by any means, including by computer:

Count	Date	File Name
Count 1	8/17/2018	pmom (4).mp4
Count 2	8/18/2018	pmom (1).mp4
Count 3	10/4/2019	Chloe (46).jpg

The productions of the foregoing visual depictions involved the use of a minor engaging in sexually explicit conduct and were depictions of such conduct. Each entry in the above table constituting a separate violation of Title 18, United States Code, Section 2252A(a)(2).

Count Four

On or about January 7, 2020, in the Eastern District of North Carolina, CAMERON HAYES, the defendant herein, did knowingly possess one or more matters, that is, computer hard drives and computer media containing digital and computer images and videos, the production of which involved the use of one or more prepubescent minor or a minor who had not attained 12 years of age, engaging in sexually explicit conduct, and which images visually depicted such conduct. The images and videos had been mailed, shipped and transported in interstate and foreign commerce and by use of means and facilities of interstate commerce, i.e., the Internet, and were produced using materials which had been mailed, shipped, or transported in interstate and foreign commerce, by any means including by computer, all in violation of Title 18, United States Code, Section 2252A(a)(5)(B).

[Remainder of page intentionally left blank]

FORFEITURE NOTICE

The named defendant is hereby given notice that all of the defendant's interest in all property specified herein is subject to forfeiture.

Upon conviction of one or more of the offenses set forth in Counts One through Four above, CAMERON HAYES, the defendant herein, shall forfeit to the United States, pursuant to Title 18, United States Code, 2253(a):

(1) any visual depiction or book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped, or received in violation of the offense(s);

(2) any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from the offense(s); and

(3) any property, real or personal, used or intended to be used to commit or to promote the commission of said offense(s) or any property traceable to such property.

The forfeitable property includes, but is not limited to:

(a) an Apple I-Phone 8 Plus bearing s/n: dx3xgopbjcln, and

(b) an Apple Macbook Laptop bearing s/n: c02g67vedrj7.

If any of the above-described forfeitable property, as a result of any act or omission of the defendant –

(1) cannot be located upon the exercise of due diligence;

(2) has been transferred or sold to, or deposited with, a third party;

(3) has been placed beyond the jurisdiction of the court;

(4) has been substantially diminished in value; or

(5) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), through 18 U.S.C. Sections 2253 or 1467, whichever may be applicable, to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property.

A TRUE BILL

REDACTED VERSION

Pursuant to the E-Government Act and the federal rules, the unredacted version of this document has been filed under seal.

FOREPERSON

Date: 5/12/2020

ROBERT J. HIGDON, JR.
United States Attorney

By:  For:

JAKE D. PUGH
Assistant United States Attorney
Criminal Division